



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEPTEMBER 20, 1999

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

Ms. Dorcee Lauen
Williams & Company/PSTIF
P.O. Box 8100
Sioux City, IA 51102-8100

Dear Ms. Lauen:

Thank you for your electronic mail message dated July 7, 1999, to Paul Miller of my staff regarding the 3-year cathodic protection testing requirement for cathodically protected underground storage tanks (USTs). In your message, you asked the Office of Underground Storage Tanks (OUST) to clarify the term "every 3 years" with regards to the cathodic protection testing requirement in the federal regulations. The regulations at 40 CFR 280.31(b)(1) state that:

"All cathodic protection systems must be tested within 6 months of installation and at least every 3 years thereafter or according to another reasonable time frame established by the implementing agency."

OUST interprets this statement to mean that a cathodic protection test must be conducted on or before the same day of the third year after the previous cathodic protection test has occurred. Please note that the Federal regulations allow implementing agencies to establish another reasonable time frame.

Please contact Paul Miller of my staff via e-mail at miller.paul@epa.gov, via phone at 703/603-7165, or via FAX at 703/603-9163 if you have further questions.

Sincerely,

/s/

Sammy Ng, Acting Director
Office of Underground Storage Tanks

cc: State UST Program Managers
EPA Regional Program Managers
Wayne Geyer, Steel Tank Institute
Kathy Nam, OGC
Shonee Clark (compendium)